

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

STEWART HEALTH CARE SYSTEM,  
LLC, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-90213 (CML)  
(Jointly Administered)

Dr. Manisha Purohit, Dr. Diane Paggioli,  
Dr. James D. Thomas, Dr. Thomas Ross,  
Dr. Michael Regan, Dr. Peter Lydon,  
Dr. Sridhar Ganda, and Dr. A. Ana Beesen,  
for themselves and those similarly situated,

Plaintiffs,

Misc. No.

V.

Steward Health Care System LLC, IASIS Healthcare, LLC, and Patrick Lombardo, in his role as Executive Vice President for Human Resources for Steward Health Care System LLC; and John and Jane Does, in their roles as Committee Members and/or Management Board Members,

Defendants.

**DECLARATION OF MANISHA PUROHIT, M.D. IN SUPPORT OF EMERGENCY  
MOTION FOR AN ORDER STAYING HEARING ON THE TURNOVER MOTION**

I, Manisha Purohit, M.D., being over 18 years of age and competent in all respects to testify, having personal knowledge of the facts set forth below, and under penalties of perjury,

<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors' service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

hereby state, swear, and affirm the following, pursuant to § 1746 of title 28 of the United States Code:

1. I am a physician, and was employed by Steward Health Care System, LLC (“**Steward**”), one of the debtors and debtors in possession (the “**Debtors**”) in the chapter 11 cases of *In re Steward Health Care System, LLC, et al.*, Case No. 24-90213 (Bankr. S.D. Tex.), until September 2024, when HonorHealth acquired the Steward health care facilities in Arizona in which I work.

2. I submit this declaration in support of the *Emergency Motion for an Order Staying the Hearing on the Turnover Motion* (the “**Emergency Motion**”) filed by the Participants.<sup>2</sup> I am one of the Participants, as I was a participant in and beneficiary of the Steward Health Care Deferred Compensation Plan (the “**SHC DC Plan**”) and the IASIS Healthcare Executive Savings Plan (the “**IASIS DC Plan**,” and together with the SHC DC Plan, the “**Plans**”).

3. I joined IASIS Healthcare as a physician in 2012. In 2017, Steward acquired IASIS Healthcare, and I became an employee of Steward. In September 2024, HonorHealth acquired the Steward health care facilities in which I work, and I am now employed by HonorHealth.

4. I became a participant in the IASIS DC Plan in 2012 when I became an employee of IASIS. When presented with the option to become a participant in the IASIS DC Plan (and re-enroll, in subsequent years), I was not provided the opportunity to negotiate the terms of my participation in such Plan. I have no memory of being informed by IASIS that electing to participate in the IASIS DC Plan carried with it a risk of the loss of my contributions to that Plan. My participation in the IASIS DC Plan ended when Steward acquired IASIS.

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Emergency Motion.

5. I became a participant in the SHC DC Plan in 2017 when Steward acquired IASIS. When presented with the option to become a participant in the SHC DC Plan (and re-enroll, in subsequent years), I was not provided the opportunity to negotiate the terms of my participation in such Plan. As with the IASIS DC Plan, I have no memory of being informed by Steward that electing to participate in the SHC DC Plan carried with it a risk of the loss of my contributions to that Plan. My participation in the SHC DC Plan ended when Steward filed bankruptcy.

6. When I enrolled in the Plans for a particular year, I could not unenroll until the following year's enrollment period.

7. At no time—prior to becoming a participant in each Plan or before annual enrollment—was I presented with information regarding the financial condition of IASIS or Steward, and at no point was I informed that Steward was insolvent.

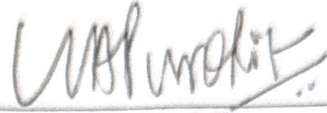
8. Had I been informed that Steward was insolvent, I would not have re-enrolled in the Plan for the 2024 year, or any other year for which that was the state of Steward's financial condition.

9. I will be harmed personally if the assets of the Plans are turned over to the Debtors' bankruptcy estates. Based on my understanding of the Plans and how they could support my retirement, I elected to contribute the maximum level of contribution (75% of my salary). I do not personally have any other meaningful real retirement savings. These Plans are the primary source of my savings. For years, I worked tirelessly and devoted my professional life to the care of patients of IASIS and Steward, with the expectation of using my hard-earned contributions in the Plans for my retirement. My purpose for contributing the maximum level was with my future in mind. If the assets of the Plans turned over to the Debtors' bankruptcy estates, it will devastate

my ability to retire. It would change my timeline for retirement, and completely alter my plan for retirement.

*[remainder of page is blank – signature page follows]*

Solemnly affirmed and signed this 12th day of March, 2025, under the penalties of perjury.

A handwritten signature in black ink, appearing to read 'Manisha Purohit', written over a horizontal line.

Manisha Purohit, MD